

The Honorable Lauren King

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRAD NORMAN,

Plaintiff,

vs.

THE TRAVELERS INDEMNITY
COMPANY, a foreign insurer doing business
as "TRAVELERS" in the State of
Washington,

Defendant.

NO. 2:20-CV-01250-JCC

DEFENDANT'S EXPERT
DISCLOSURE

Pursuant to FRCP 26(a)(2) and in accordance with the Court's November 4, 2021 Order,
Defendant makes the following disclosure of expert witnesses.

I. 26(a)(2)(B) EXPERTS RETAINED TO PROVIDE TESTIMONY

1. Howard Lloyd, Psy.D.
C/O Physician Direct Services
406 Yauger Way, Suite A
Olympia, WA 98502
(360) 867-4188

DEFENDANT'S EXPERT DISCLOSURE

- 1 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1 Dr. Lloyd, a Neuropsychologist, may be called to testify about his findings and opinions
2 regarding Plaintiff's claimed injuries. Dr. Lloyd's opinions and findings regarding Brad Norman
3 are in his report which is attached as **Exhibit A**.

4 (a) **Qualifications**: See Dr. Lloyd's curriculum vitae attached as **Exhibit B**.

5 (b) **Testimony**: Dr. Lloyd has not provided expert testimony in the last four years.

6 (c) **Compensation to be paid**: Dr. Lloyd's billing rate is outlined in his rate schedule,
7 attached as **Exhibit C**.

8 (d) **Data considered**: In preparation for Dr. Lloyd's trial testimony, he has been
9 provided with copies, or has reviewed copies, of the medical records of Brad Norman, the police
10 report, raw data of neuropsychological testing of Brad Norman conducted by Martha Glisky,
11 Ph.D., discovery responses and deposition transcripts.

12 2. Bradley Probst, MSBME
13 C/O ARCCA
14 3455 Thorndyke Avenue West, Suite 206
15 Seattle, WA 98119
16 (888) 731-3749

17 Mr. Probst, a biomechanical expert, may be called to testify about his findings and
18 opinions regarding Plaintiff's claimed injuries. Mr. Probst's opinions and findings regarding
19 Brad Norman are in his report which is attached as **Exhibit D**.

20 (a) **Qualifications**: See Mr. Probst's curriculum vitae attached as **Exhibit E**.

21 (b) **Testimony**: See Mr. Probst's list of cases attached as **Exhibit F**.

22 (c) **Compensation to be paid**: Mr. Probst's billing rates are \$425/hour for testimony
23 and \$375/hour for analysis and travel.

24 (d) **Data considered**: In preparation for Mr. Probst's trial testimony, he has been
25 provided with copies, or has reviewed copies, of the medical records of Brad Norman, the police
report, discovery responses and deposition transcripts.

1 DATED this 9th day of May 2022.

2 BETTS, PATTERSON & MINES P.S.

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4 By *S. Karen Bamberger*
5 S. Karen Bamberger, WSBA #18478
6 Attorneys for Defendant
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DEFENDANT'S EXPERT DISCLOSURE

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CERTIFICATE OF SERVICE

I, Sharon Damon, hereby certify that on May 9, 2022, I caused to be served upon counsel of record the foregoing Defendant's Expert Disclosure via email:

Counsel for Plaintiffs

David LaCross
LACROSS & MURPHY PLLC
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fdlacross@gmail.com

Sunshine M. Bradshaw
WARRIOR WOMAN LAW, PLLC
569 Division Street, Suite D
Port Orchard, WA 98366
sunshine@warriorwomanlaw.com

DATED this 9th day of May, 2022.

/s Sharon Damon

Sharon Damon, Legal Assistant
sdamon@bpmlaw.com

DEFENDANT'S EXPERT DISCLOSURE

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